



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ENFORCEMENT CONFIDENTIAL
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INSPECTION NARRATIVE MEMORANDUM

From: Kevin Daniel, RMP Coordinator *KD 9/10/12*

*J. Armstrong
reviewed 09/24/12*

To: File

**Presented Credentials and read Consent to Access Card to Mr. Mike Washington @
8:05 AM**

Re: JCI Jones Chemicals, Inc.

- a) Date of Inspection: 6/21/12
- b) Reason for Inspection: High Risk
- c) JCI Jones is a Program Level 3 facility.

JCI Jones is not a Title V facility.

- d) Parties present during inspection:

Mike Washington, Branch Manager, JCI Jones Chemicals, Inc. (804) 633-5066, mwashington@jcichem.com

Timothy Gaffney, Executive Vice President, JCI Jones Chemicals, Inc. (585) 538-2314 tgaffney@jcichem.com

Gary Kohr, Maintenance, JCI Jones Chemicals, Inc. (804) 633-5066, garykohr@jcichem.com

EPA Personnel:

Kevin Daniel, USEPA, RMP Coordinator/Inspector (215) 814-324
daniel.kevin@epa.gov

Robert Langel, USEPA, SEE/Inspector (215) 814-3119
langel.robert@epa.gov

- Operations
- Safety, Health & Environmental management
- Training Emergency response
- Hazard & Operability Study (HAZAP)
- Results & Conclusions of What/If Hazards Analysis

Operating Procedures:

Standard Operating Procedures (SOPs) were reviewed and obtained. SOPs are developed for the operation of each process. Procedures include an SOP for product filling and transfer, railroad operations, compressed gas container testing/ inspections and repackaging of compressed gases.

Training:

Training documents were reviewed and obtained. Each employee receives specialized training in their specific job responsibilities. Training records were pulled for an individual employee that showed:

- Hazard Communication Program Training
- MSDS Training
- Hazard Reporting Procedures
- Emergency Plant Shutdown
- Lock out/tag out Program
- Function Specific Training

Mechanical Integrity:

Mechanical integrity documents were reviewed and obtained. The facility has a preventative maintenance management system to keep the plant running. There are three parts to the preventative maintenance (PM) system which include:

- Scheduling of Maintenance
- Performance of Maintenance
- Documentation of Work Performed

Monthly, weekly and daily and PM checks represent the bulk of the facility's maintenance program. Performance maintenance including inspections, function tests and general service tests are also performed on equipment and mechanicals. Preventative maintenance checklists are used to inspect all aspects of the process including railcar operations.

Management of Change:

Management of Change (MOC) procedures were reviewed and obtained. The facility

Emergency Response Program:

The facility emergency response plan was reviewed and obtained. The plan includes all aspects of emergency response including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas.

g) Photograph Log: See Attachment-A

h) Interviews that were conducted during the inspection:

Credentials were presented to Mr. Washington and Mr. Gaffney along with reading the Consent to Access Card at 8:50AM. Inspector Langel and I explained to Mr. Washington and Mr. Gaffney because of the extreme heat index for our inspection that day, we would conduct our field inspection first. We also explained that our inspection was going to focus on the RMP program documentation elements and the chlorine processes. In addition, we explained why the facility was considered high risk. After our explanations, Mr. Washington, Mr. Gaffney and Mr. Kohr began to escort us to the facility processing area where we conducted the field tour. Inspector Langel and I verified the facility's bleach machine, air compressor, emergency response gear, emergency shutoffs, cylinder filling room, valve stations, railcar hookups, railcar emergency shutoffs, detectors and railcar closure system. Bleach tanks all had containment.

At approximately 1:00 PM the facility tour ended. Mr. Washington, Mr. Gaffney and Mr. Kohr returned to the conference room where we proceeded to review the RMP documentation. Inspector Langel and I reviewed the following documentation and found them to be adequate:

- Management System
- Block flow diagrams
- Plot Plan
- Process Safety Information
- Hazard Assessment
- Maximum Intended Inventory
- Process Hazard Analysis
- Operating Procedures
- Training
- Mechanical Integrity
- Management of Change
- Pre-Startup Review
- Compliance Audits
- Incident Investigations
- Employee Participation
- Hot Work Permits

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112 (r)(7) Inspection Checklist -40 CFR Part 68
RMP Program 3 Facilities

SUBPART A - GENERAL INFORMATION

(Y=Yes, N=No, P=Partial, A= Not Applicable)

Facility Name: JCI Jones Chemicals, Inc. Milford

Mailing Address: 16248 Industrial Drive
Milford, VA 22514

Physical Address: 16248 Industrial Drive
Milford, VA 22514

County: Caroline

Case Number: 12-VA-RMP-006

Inspection Date: June 21, 2012

Phone Number: 804-633-5066

Facility Contact: FACREP1STNAME, FACREPSURNAME

E-mail address:

Website address:

Is facility subject to OSHA PSM? Y or N

What is/are the process program level(s)? 3

Is facility using administrative controls? Y or N

Are administrative controls documented and followed properly? Y or N

Has the facility met requirements for the management system specified in 40 CFR 68.15? Y or N

SUBPART B - HAZARD ASSESSMENT

a. (Y) Worst case scenario(s). Used "Rural" topographic factor in calculation. The correct topographic factor for this facility's location is "Urban".

b. (Y) Alternative release scenario(s). See Documents List Item 14.

c. (A) Five-year accident history (Facility may show no accidents; on-site and off-site history should be documented)

Comments: None.

SUBPART D - PREVENTION PROGRAM FOR PROGRAM 3 FACILITIES

(check to ensure that the following are documented and updated)

1. PROCESS SAFETY INFORMATION - 40 C.F.R. 68.65

- a. (Y) MSDS for all regulated substances See Documents List Item 7.
- b. (Y) Flow/block diagram of process(es). See Documents List Item 8.
- c. (A) Process chemistry. Repackages and distributes chlorine. Stores and distributes sulfur dioxide. No longer makes ammonium hydroxide.
- d. (Y) Maximum intended inventory of regulated substances. See Documents List Item 3.
- e. (Y) Safe upper and lower temperatures, pressures, flows, and compositions
- f. (Y) Evaluation of consequence of deviation from limits
- g. (Y) Material of construction for equipment in process
- h. (Y) Piping and instrumentation diagram (P&IDs)
- i. (Y) Electrical classification
- j. (Y) Relief system design and design basis
- k. (Y) Ventilation system design. Cylinder filling stations equipped with safety vent hood. See Documents List Item 18.
- l. (Y) Design codes and standards employed
- m. (A) Material and energy balances (for source constructed after June 21, 1999)
- n. (Y) Safety systems (interlocks, suppression, and/or detection)
- o. (Y) Process equipment complies with generally accepted good engineering practices, state and federal design rules

Comments: None.

2. PROCESS HAZARD ANALYSIS - 40 C.F.R. 68.67

- a. (Y) Identify hazards associated with process
- b. (Y) Process meets all state and federal design rules or industry standards if applicable
- c. (Y) Results of analysis documented and problems resolved
- d. (Y) Review updated every 5 years

Comments: See Documents List Item 10.

3. OPERATING PROCEDURES - 40 C.F.R. 68.69

- a. (Y) Written operating procedures for each covered process as required by 68.69
- b. (Y) SOPs updated whenever major change occurs and prior to startup of the changed process
- c. (Y) SOPs for maintenance activities, including lockout/tag out, confined space entry, opening process equipment and piping, and other activities

Comments: See Documents List Item 19.

4. TRAINING - 40 C.F.R. 68.71

- a. (Y) Documentation of proper employee training, including initial and refresher training a minimum of every three years on process and emergency response if applicable
- b. (Y) Operators are trained in new procedures prior to startup of process after a major change (Employee Interview)

Comments: See Documents List Item 20.

5. MECHANICAL INTEGRITY - 40 C.F.R. 68.73

- a. (Y) SOPs for ensuring mechanical integrity
- b. (Y) Employee training for process maintenance activities
- c. (Y) Inspection and testing on process equipment pressure vessels and storage tanks, piping systems, relief valves and vent systems, emergency shutdown systems, controls, monitoring devices, alarms, and pumps
- d. (Y) Inspection and testing follow recognized and generally accepted good engineering practices
- e. (Y) Frequency of testing and inspections consistent with manufacturer's recommendations and good engineering practices

Comments: See Documents List Items 11, 12, & 13..

6. MANAGEMENT OF CHANGE - 40 C.F.R. 68.75

- a. (Y) Procedures that document basis for change, impact on health and safety, and modifications to SOPs before change implemented
- b. (Y) Employees aware of change and trained in new SOPs
- c. (Y) Employees and contractor involved in potential changes that may affect their job tasks (Employee Interview)

Comments: See Documents List Item 21.

7. PRE-STARTUP REVIEW - 40 C.F.R. 68.77

- a. (Y) Construction and equipment in accordance with design specifications
- b. (Y) Safety, operating, maintenance, and emergency procedures are in place and adequate
- c. (Y) Process hazard analysis conducted with recommendations and resolutions
- d. (Y) Employees trained in new process(es)

Comments: See Documents List Item 26.

8. COMPLIANCE AUDITS - 40 C.F.R. 68.79

- a. (Y) Owner/operator certified that they evaluated compliance once every three years by person knowledgeable of process
- b. (Y) Findings documented, reviewed with employees, and retained for five years

Comments: See Documents List Item 23.

9. INCIDENT INVESTIGATIONS - 40 C.F.R. 68.81

- a. (Y) Accidents with or potential for catastrophic releases have been investigated within 48 hours following incident
- b. (Y) Findings documented, reviewed with employees, and retained for five years

Comments: See Documents List Item 24.

10. EMPLOYEE PARTICIPATION - 40 C.F.R. 68.83

- a. (Y) Owner/operator has written plan for employee participation
- b. (Y) Employees aware of risk management program, hazard analyses, and process safety management

Comments: See Documents List Item 27.

11. HOT WORK PERMITS - 40 C.F.R. 68.85

- (Y) Hot work permits issued for work near or in affected process(es)

Comments: See Documents List Item 22.

12. CONTRACTORS - 40 C.F.R. 68.87

- a. (Y) Contractors informed of potential fire hazard and/or toxic release hazard associated with affected process(es)
- b. (Y) Contractors aware of emergency action plan
- c. (Y) Owner/operator developed procedures for control of contractors in to and out of affected process(es)

Comments: See Documents List Item 17.

SUBPART E - EMERGENCY RESPONSE PROGRAM

- a. (Y) Facility coordinated with LEPC, fire department or other local agencies
- b. (Y) Facility has Emergency Response Plan (if appropriate)
- c. (Y) Employees are aware of Emergency Response Plan (determine through employee interviews)
- d. (Y) Is facility included in community emergency response plan? (Program 2 and 3 facilities)

Comments: See DocumentsList Item 25.

A. SITE SECURITY

(Y) Plant,.

Comments: Facility enclosed by security fencing..

Facility Personnel Participating in Audit/Inspection

Mike Washington, Branch Manager, JCI Jones Chemicals, Inc. (804) 633-5066, mwwashington@jcichem.com

Timothy Gaffney, Executive Vice President, JCI Jones Chemicals, Inc. (585) 538-2314

tgaffney@jcichem.com

Gary Kohr, Maintenance, JCI Jones Chemicals, Inc. (804) 633-5066, garykohr@jcichem.com

NOTES AND COMMENTS

Facility meets minimum requirements for a number 3 RMP.

RECOMMENDATIONS

- 1) Install NFPA 704 labels to entry doors of the chlorine filling room for emergency responder notification.

Inspector's Name: Robert J. Langel, P.E.

Signature: _____

Date: _____

Robert J. Langel
09/10/12

Kevin Daniel 9/24/12
Armstrong
9/24/12

Appendix

Item A. GDC/RMP Inspection Sign-in Sheet for June 21, 2012. Attached business card.

Item B. Visitor Safety Rules, Rev 5/13/2011.

Item C. Overview of the RMP Management System.

RECEIPT FOR SAMPLES AND DOCUMENTS (JCI Jones Chemicals, Inc. Milford)

Three pages of 27 documents collected on June 21, 2012.